

**ORIGINAL**

(14)

3-22-02

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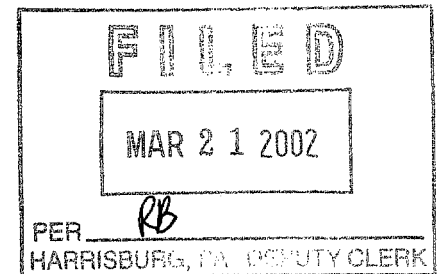
IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JEFFREY D. ALBRIGHT, ET AL. : CIVIL NO. 1: CV-00-0878  
:  
AND :  
:  
RICKEY A. BECHTEL : CIVIL NO. 1: CV-01-789  
Plaintiffs, :  
:  
v. :  
:  
DANIEL A. VIRTUE, ET AL. : JUDGE SYLVIA RAMBO

MOTION TO CONSOLIDATE CASES

AND NOW, come Plaintiffs, Jeffrey D. Albright, et al., by and through their attorney, Robert S. Mirin, Esquire, and pursuant to FRCP 42, respectfully move this Court, to consolidate the following cases, Jeffrey D. Albright, et al v. Daniel A. Virtue, et al. and Rickey Betchel v. Daniel A. Virtue, et. al. and represent as follows:

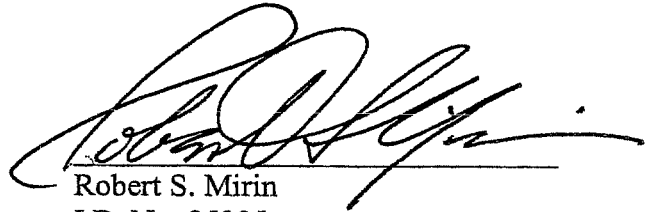
1. The same contracts (collective bargaining agreements) and provisions are involved.
2. The same terminal closure is involved.
3. The same Union is involved.
4. The same employer is involved.
5. The same time frames are involved in both cases.
6. The same recall and grievance timeliness issues are involved.
7. The same call board issues are involved.
8. There is an extensive common "locus" of issues of law and facts apply to both cases.



**WHEREFORE**, it is respectfully requested that this Motion to Consolidate  
be granted.

Dated: 3-21-02

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Robert S. Mirin', is written over a horizontal line.

Robert S. Mirin

I.D. No. 25305

**AHMAD & MIRIN**

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Attorney for Plaintiffs

**CERTIFICATE OF SERVICE**

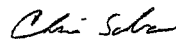
I hereby certify that on this 21<sup>st</sup> day of March, 2002, a copy of *Motion to Consolidate Cases* was served first-class mail, postage prepaid, on the following:

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